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17 LINKEDIN CORPORATION

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JANE DOE, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

LINKEDIN CORPORATION and GOOGLE
LLC,

Defendants.

Case No. 5:25-cv-03737-EJD

STIPULATION AND ~~PROPOSED~~
ORDER CONSOLIDATING CASES

CYNTHIA HAYS, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

LINKEDIN CORPORATION,

Defendant.

Case No. ⁵3:25-cv-04181-EJD

STIPULATION AND ~~PROPOSED~~ ORDER CONSOLIDATING CASES

Case No. 5:25-cv-03737-EJD

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Pursuant to Federal Rule of Civil Procedure 42(a), Plaintiffs Jane Doe and Cynthia Hays (“Plaintiffs”) and Defendant LinkedIn Corporation (“LinkedIn”) jointly request that the above-captioned actions (the “Actions”) be consolidated for all pretrial and trial proceedings. Plaintiffs and LinkedIn, by and through their undersigned counsel, stipulate as follows:

WHEREAS, on April 29, 2025, Plaintiff Doe filed a Complaint against LinkedIn and Google LLC in *Doe v. LinkedIn Corporation*, No. 5:25-cv-03737-EJD (N.D. Cal.) (“*Doe*”);

WHEREAS, on May 15, 2025, Plaintiff Hays filed a Complaint against LinkedIn in *Hays v. LinkedIn Corporation*, Case No. ⁵3:25-cv-04181-EJD (N.D. Cal.) (“*Hays*”);

WHEREAS, on June 2, 2025, LinkedIn filed an Administrative Motion to Consider Whether Cases Should Be Related regarding *Doe* and *Hays* (*Doe*, Dkt. 19);

WHEREAS, on June 2, 2025, this Court granted the motion and ordered the Clerk to relate the later-filed *Hays* to *Doe* (*Doe*, Dkt. 21);

WHEREAS, Plaintiffs and LinkedIn agree that consolidation of the Actions will advance the just and efficient progress of this litigation, reduce case duplication, conserve Court and party time and resources, avoid the need to contact parties and witnesses for multiple proceedings, and minimize the expenditure of time and money for all parties involved. *See* Fed. R. Civ. P. 42(a);

WHEREAS, Plaintiffs and LinkedIn agree that Plaintiffs’ counsel in *Doe* and *Hays* will confer and file a superseding Consolidated Class Action Complaint,

WHEREAS, Plaintiffs and LinkedIn agree to set a deadline for LinkedIn to respond to the Consolidated Class Action Complaint;

WHEREAS, Plaintiffs and LinkedIn agree that all pending schedules, hearings, deadlines, or dates in the separate *Doe* and *Hays* actions should be taken off-calendar in light of consolidation, to be reset following resolution of LinkedIn’s anticipated motion to dismiss the Consolidated Class Action Complaint;

WHEREAS, by stipulating to consolidation of the Actions, LinkedIn does not concede the plausibility or truth of any of Plaintiffs’ allegations or that certification of the putative classes is proper under Federal Rules of Civil Procedure 12 or 23 and specifically reserves its right to move to dismiss and/or oppose class certification on all available grounds;

1 WHEREAS, Plaintiffs have represented that the consolidated complaint will not contain
 2 allegations against Google and on that basis Google does not oppose the request relief;

3 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between
 4 Plaintiffs and LinkedIn, through their undersigned counsel, and subject to the Court's approval:

5 1. The Actions shall be consolidated for all purposes under Federal Rule of Civil
 6 Procedure 42(a) into the "Consolidated Action." An original copy of this Order shall be filed by
 7 the Clerk in each of the consolidated cases.

8 2. All papers to be filed in the Consolidated Action shall be filed on the *Doe* docket.
 9 The case file for the Consolidated Action will be maintained under the *Doe* case number, 5:25-cv-
 10 03737-EJD.

11 3. The *Hays* action shall be closed in accordance with the regular procedures of the
 12 Clerk of this court. All papers previously filed and served to date in *Hays* are part of the record in
 13 the Consolidated Action.

14 4. The Consolidated Action shall remain related to *L.B. v. LinkedIn Corporation*, No.
 15 5:24-cv-06832-EJD (N.D. Cal.), which is also related to *J.S. v. LinkedIn Corporation et al.*, No.
 16 5:24-cv-07374-EJD (N.D. Cal.); *V.R. v. LinkedIn Corporation*, No. 5:24-cv-07399-EJD (N.D.
 17 Cal.); *J.P. v. LinkedIn Corporation*, No. 5:24-cv-07586-EJD (N.D. Cal.); and *L.W.A. v. LinkedIn*
 18 *Corporation*, No. 5:24-cv-08437-EJD (N.D. Cal.). *See Doe*, Dkt. 10.

19 5. Each attorney who has already made an appearance or been admitted *pro hac vice*
 20 in *Doe* or *Hays* shall be deemed to have appeared in the Consolidated Action. Counsel who have
 21 not yet entered an appearance shall file a Notice of Appearance or motion to appear *pro hac vice*
 22 on the docket in the Consolidated Action.

23 6. All pending schedules, hearings, deadlines, or dates in the separate *Doe* and *Hays*
 24 actions shall be vacated. This includes but is not limited to (1) the deadlines for LinkedIn to
 25 respond to the separate complaints in *Doe* and *Hays*; (2) the case management conferences in *Doe*
 26 and *Hays*; and (3) all deadlines related to the case management conferences in *Doe* and *Hays*
 27 (including the deadlines to conduct the Rule 26(f) conference, file the ADR certification, serve
 28 initial disclosures, and file a joint case management conference statement). The case

management conference in the Consolidated Action shall be reset following a ruling on LinkedIn's anticipated motion to dismiss the Consolidated Class Action Complaint. All deadlines related to the case management conference, including the deadlines to conduct the Rule 26(f) conference, file the ADR certification, serve initial disclosures, and file a joint case management conference statement, will be reset upon rescheduling the case management conference, in accordance with the Civil Local Rules and the Federal Rules of Civil Procedure.

7. Plaintiffs shall file a superseding Consolidated Class Action Complaint no later than 45 days after the date the Court approves this stipulation.

8. LinkedIn shall file its response to the Consolidated Class Action Complaint no later than 45 days after the filing of the Consolidated Class Action Complaint.

IT IS SO STIPULATED.

Dated: July 7, 2025

KEKER, VAN NEST & PETERS LLP

By: /s/ Spencer McManus
 BENJAMIN BERKOWITZ
 MATAN SHACHAM
 CHRISTINA LEE
 SPENCER MCMANUS
 LIAM BROWN

 Attorneys for Defendant
 LINKEDIN CORPORATION

Dated: July 7, 2025

LYNCH CARPENTER, LLP

By: /s/ (Eddie) Jae K. Kim
 (Eddie) JAE K. KIM
 TIFFINE E. MALAMPHY

 Attorneys for Plaintiff
 CYNTHIA HAYS

1 Dated: July 7, 2025

BURSOR & FISHER, P.A.

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3 By: /s/ Joshua R. Wilner
L. TIMOTHY FISHER
JOSHUA R. WILNER

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5 Attorneys for Plaintiff
JANE DOE

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7 Dated: July 7, 2025

COOLEY LLP

8
9 By: /s/ Joshua D. Anderson
BENEDICT Y. HUR
EDUARDO E. SANTACANA
JOSHUA ANDERSON

10
11 Attorneys for Defendant
GOOGLE LLC

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14 **SIGNATURE ATTESTATION**

15 I am the ECF user whose identification and password are being used to file the foregoing
16 Stipulation. Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
17 document has been obtained.

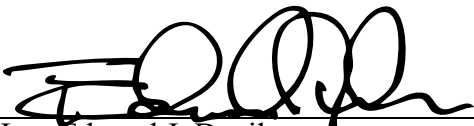
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19 KEKER, VAN NEST & PETERS LLP

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21 Dated: July 7, 2025

/s/ Spencer McManus
Spencer McManus

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23 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

24
25 Dated: September 30, 2025


Hon. Edward J. Davila
United States District Judge